

Exhibit List

- Exhibit A – Proposed Protective Order
- Exhibit B – Declaration of Christopher I. Cedillo
- Exhibit C – Email sent by Defendant Dan Hollings on March 22, 2007
- Exhibit D – April 26, 2008 New York Times article discussing the subject matter of this litigation
- Exhibit E – Printout of the Web page <www.know-more-secrets.com> on November 1, 2007
- Exhibit F – Printout of the Web page <www.know-more-secrets.com> on April 30, 2008
- Exhibit G – Printout of the Web posting at <www.webraw.com/quixtar/dan.html> on August 29, 2007
- Exhibit H – Printout of the press release posted at <www.prweb.com/printer.php?prid=222106>.

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TS Merchandising Ltd., a British Virgin Islands
corporation, and TS Production LLC, a Hungarian
limited liability company,

Plaintiffs,

vs.

Dan and Loretta Hollings, Arizona residents, and
Web Services, LLC, an Arizona limited liability
company,

Defendants.

Case No. 07 C 6518

**PROTECTIVE ORDER REGARDING USE
AND DISSEMINATION OF INFORMATION**

Hon. Ronald A. Guzman

The Court has considered the parties' Stipulation for Protective Order, and it appearing that there is good cause for an Order requiring limitations on the use and/or dissemination of documents and information that may be disclosed during discovery, **IT IS HEREBY ORDERED:**

1. Documents to be Used Solely for This Action

All documents, data, materials and information contained therein, which shall be produced by the Parties during pre-trial discovery ("Documents"), including, but not limited to transcripts, videotapes, and recordings of depositions, shall be used solely for the prosecution or defense of the claims in this action. Use and/or dissemination of such Documents by the Parties to the press or for any other business, commercial, competitive, personal or other purpose is strictly prohibited.

2. Rights Of The Parties.

Nothing herein shall impose any restrictions on the use and/or dissemination by a party of material obtained by such party by means independent of discovery from the adverse party in this action, whether or not such material is also obtained through discovery in this action. Furthermore, nothing herein shall prevent the use and/or dissemination of Documents introduced at trial in this action.

This Protective Order shall be without prejudice to the right of the parties to:

- (1) present a motion to the Court for a separate protective order or provision in the

Protective Order as to any particular document, thing, material, testimony or information, including restrictions differing from those as specified herein;

(2) make a future application for modification of the Protective Order, including modifications specific to any particular documents, information or things, and challenges to any particular use and/or dissemination of particular documents, information or things;

(3) assert privilege (including but not limited to trade secret privilege) and decline to produce any documents or information on that basis;

(4) file Documents with the Court as necessary for the prosecution or defense of claims in this action.

The Protective Order shall survive the final termination of this action, to the extent that Documents are not or do not become known to the public, and the Court shall retain jurisdiction to resolve any dispute concerning the use and/or dissemination of Documents disclosed during pre-trial discovery.

SO ORDERED this _____ day of _____, 20____.

The Honorable Ronald A. Guzman